United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Thursday October 2, 2008
From: Jena Sleboda, Remedial Project Manager

To: Rebecca Frey, RRB1, RRS3
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Subject: Initial (Non-Time Critical Removal Action)
Celotex Site
2800 South Sacramento Avenue, Chicago, IL
Latitude: 41.840957
Longitude: -87.7000033

POLREP No.: 1 **Site#:** 055Q

Reporting Period: 09/02/08 through 09/30/08

Start Date:
Mob Date: 09/02/08
Completion Date:
CERCLIS ID#:
RCRIS ID#:
FPN#:

Response Authority:
Response Type: Non-Time Critical
NPL Status: Non NPL
Incident Category: Removal Action
Contract #:
Reimbursable Acct #:

Site Description

The former Celotex Main Site consists of an approximately 20-acre parcel currently owned by 2600 Sacramento Corporation (Sacramento), and an approximately 2-acre parcel currently owned by Monarch Asphalt (Monarch). The United States Geological Survey (USGS) reference for the Main Site location indicates that it is situated in the West 1/2 of the Southwest 1/4 of Section 25, Township 39 North, Range 13 East of the Third Prime Meridian on the Englewood 7.5 Minute Quadrangle.

The Main Site is situated in a multi-use area that includes residential, commercial, manufacturing, governmental, and industrial establishments. The Cook County Correctional Facility is located east of the Main Site on the east side of Sacramento Avenue and the former Atchison, Topeka & Santa Fe railroad line crosses a portion of the area to the northwest. Residential and commercial properties are located north, west and northeast of the Main Site and

industrial property is located to the south. The Chicago Sanitary and Ship Canal is located approximately 1,500 feet south of the Main Site.

The top of the Sacramento parcel is uniformly graded (approximately 1%) with side slopes around the perimeter ranging from 3H:1V to 1H:1V. The Sacramento parcel is fenced at the base of the side slopes with a main gate on South Sacramento Avenue near 28th Street. The Monarch parcel fence follows the property boundary and separates it from the Sacramento parcel with a locked gate present off Albany Avenue. Few other permanent features are present at either parcel.

The Main Site was used for making, storing, and selling asphalt-roofing products. Former operations at the 22-acre Main Site during the approximate period of 1911 to 1989 may have resulted in the release of polycyclic aromatic hydrocarbons (PAHs) to the ground and into the air. Facility closure (1989), demolition of the Main Site (1993), and subsequent actions have all taken place and it has been determined that there are no known ongoing releases, associated with historical operations, occurring from the Main Site.

Currently, the 20-acre Sacramento parcel is elevated compared to surrounding grade. The portion of the Site that is above surrounding grade consists of a bottom clay layer ("Cover"), a middle soil layer ("Fill"), and the Cap. The placement of the Cover, Fill, and Cap materials on the Main Site post-dates Honeywell's ownership of the Main Site.

First, following completion of facility demolition (during which crushed building materials may have been used as site fill), the "Cover" was placed over the Sacramento parcel. The Cover is approximately two feet thick. The source of the clay has not been verified; however, a letter from Environmental Resources Management Group to USEPA indicates it was undisturbed material generated during a construction project at the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) wastewater treatment plant in Stickney, Illinois.

Second, the Fill, which consists of miscellaneous soil from other sources, including possibly soil material from a construction project at the Cook County Jail, was likely placed on top of the "Cover." There is no information concerning when the "Fill" placement activities took place or the precise thickness of the "Fill." It is thought that the "Fill" was placed on the Site by the Celotex Corporation. A site survey documenting the site topography after the clay "Cover" and "Fill" placement was prepared in 1996 by Westshore Engineering and Surveying.

"Cover" and "Fill" materials and the underlying soils were sampled in 1997 in connection with an Engineering Evaluation and Cost Analysis (EE/CA) performed by Honeywell pursuant to an Administrative Order on Consent. Samples were also collected from the Monarch parcel.

In 1997, following placement of the "Cover" and "Fill" materials and the EE/CA sampling, regrading of the Sacramento parcel was conducted in accordance with a Storm Water Management Plan to address storm water runoff issues. Neither the final topography of the Sacramento parcel nor the resulting thickness of the reworked "Cover" and "Fill" were documented after the storm water management plan implementation.

Third, in or about 2002, 2600 Sacramento Corporation placed the Cap, with a reported thickness of 2 feet of gravel over the "Fill" and "Cover" materials in order to prepare the Sacramento parcel for truck staging operations. The precise placement and source of the "Cap" material are unknown to Honeywell, however, Honeywell surveyed the Cap thickness in 2006 and found the average thickness throughout the site was about 1.5 feet.

Following the completion of the EE/CA, USEPA issued an Action Memorandum (March 2005 Action Memorandum) finding that subsurface contaminants should be addressed by the placement of 2 feet of granular material on the Main Site (to the extent one was not already in place) and the recording of certain restrictive covenants. Honeywell and USEPA subsequently entered into a second Administrative Order on Consent (2006 AOC) whereby Honeywell agreed to perform the activities set forth in the March 2005 Action Memorandum. The development Main Site Removal Action is one of the tasks under the 2006 AOC.

Current Activities

SulTRAC is conducting field oversight of activities performed by Honeywell's contractors at the Celotex Main Site Area. Activities being performed include stone transportation activities performed by an excavator and delineating the access limits along the site perimeter.

The week of September 2, the construction subcontractor HIS conducted activities for delineating the access limits along the main site perimeter. The access limits were marked at a distance of 55 feet from the top of the slope. Distance measuring wheel and paint were used to measure and mark lines at the main site.

The week of September 8 the few trees to be protected were marked at sites. Clearing and grubbing activities were performed on the southwest and southeast side slopes of the Sacramento parcel. Silt fences were installed along the southern perimeter of the Sacramento parcel. Tires found at the site were staged at the northern part of the Sacramento parcel.

On September 9, 2008, construction of an access road started between the Monarch parcel and Sacramento parcel. Four 55-gallon buckets labeled 'motor oil' were seen along the area dividing the Monarch and Sacramento parcels. The buckets were placed near the pile of the removed soil at the site.

On September 12, 2008, during clearing and grubbing activities, three buried buckets labeled 'motor oil' were discovered; into the ground. The dozer used for clearing the soil punched the buried buckets that were spilling oil in the ground. The buckets were covered with plastic and placed at the site.

Mechanical excavators were used to perform construction and clearing and grubbing at the site. At the end of the day, the excavated soil was stockpiled at the top of the slope on the Sacramento Parcel, and the main staging area was secured. Air monitoring conducted by CH2M Hill indicated that no action levels were exceeded.

The week of September 15, clearing and grubbing activities were performed on the southwest and southeast side slopes of the Sacramento parcel. Silt fences were installed along the southern

and eastern perimeter of the Sacramento parcel. Tires found at the site were staged at the northern part of the Sacramento parcel.A gate was set up on the southwest portion of the Sacramento parcel near the CH2M Hill office. Wood chips were produced from the trunks of the trees that were cut at the main site. The remaining roots of the cut trees were mixed with the removed soil and send to a landfill.

On September 19, 2008, a concrete vault/pit was discovered while removing soil on the south east portion of the Sacramento parcel. The concrete vault consists of soil and vegetation. The concrete vault is currently surrounded by caution tape and barricades.

The week of September 22, clearing and grubbing activities were performed on the southwest, southeast and northeast side slopes of the Sacramento parcel. Fences were removed and replaced back as necessary while doing the clearing and grubbing activities. While performing the clearing activities on the northeastern slope of Sacramento parcel, additional excavation up to a depth of 2ft was conducted at several places and excavated soil and concrete was stockpiled on clean cap at a distance of 8ft from the top of the slope. CH2M Hill was made of aware of this activity and additional excavation was immediately stopped. Dark tar like material with sharp smell was found at several places on the eastern side slope of Sacramento parcel. Such areas on the side slopes were patched with clean soil.

Few concrete blocks with steel poles were removed for installing the silt fences on the eastern slope of the Sacramento parcel. Silt fences were installed along the southern and eastern perimeter of the Sacramento parcel. Tires found at the site were staged at the northern part of the Sacramento parcel.

Wood chips were produced from the trunks of the trees that were cut at the main site. The removed vegetation is currently staged in a lined area on Monarch parcel. Clean soil coming to the site was staged in Monarch parcel.

On September 24, 2008, an inactive storm water man hole was uncovered near the eastern slope of the Sacramento parcel. A metal pit with cover was also discovered on the southeastern slope of the Sacramento parcel.

Mechanical excavators were used to perform clearing and grubbing activities at the site. The excavated soil that was stockpiled at the top of the slope was loaded on to the trucks and was transported to the landfill. At the end of the day, the main staging area was secured and the work area was surrounded by caution tape and barricades. The stock piled soil was covered with plastic tarp. Few soil heaps existing at the top of the slope was pushed back on the slope by dozer at the end of the day. Air monitoring conducted by CH2M Hill indicated that no action levels were exceeded. Water was sprayed regularly to suppress air dust at site.

Two security guards were visible at the site for the duration of the project, along with additional police patrol.

Planned Removal Actions

The Removal Action will continue to address the re-grading of side slopes and will then address supplementing the current Cap to ensure there is at least two feet of cover throughout the side

Next Steps
Work with the City of Chicago to address possible change of material(s) at portions of the site to facilitate the creation of a park at the site.

Key Issues
Various structures and discarded oily material have been encountered during excavation on the side slopes. These issues have been dealt with on a case by case basis.

Estimated costs
$0